

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

| | | |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Docket No. 20-cr-40036-TSH |
| |) | |
| |) | |
| VINCENT KIEJZO |) | |

**ASSENTED-TO MOTION TO CONTINUE
FURTHER INTERIM STATUS CONFERENCE**

The defendant, Vincent Kiejzo, respectfully requests that the further interim status conference presently scheduled for April 8, 2021 be continued for a period of approximately 45 days. As grounds, undersigned counsel states that she previously sought and was granted additional time to file a discovery motion after having received, on or about March 17 and 18, 2021, some responsive discovery from the government. After reviewing the responsive discovery provided thus far and conferring again today with the government, counsel anticipates submitting additional requests for discovery as well as more fulsome justifications for her previous requests. In order to facilitate a more comprehensive briefing for the court and to avoid having to litigate multiple motions for discovery – and perhaps to obviate the need for the Court’s intervention on certain discovery matters – counsel requests additional time to be able to make those additional requests of the government and to enable the government to respond.

Counsel, on behalf of Mr. Kiejzo, would agree to an order of excludable delay from April 8, 2021 through the date of the newly-scheduled further interim status conference. Counsel conferred with AUSA Kristen Noto and understands that the government assents to the request for a continuance, outlined herein.

VINCENT KEIJZO
By His Attorney,

/s/ Sandra Gant

March 26, 2021

Sandra Gant

BBO # 680122

Federal Public Defender Office

Temporary Mailing Address:

P.O. Box 51268

Boston MA 02205

Physical Address:

51 Sleeper Street, 5th Floor

Boston, MA 02210

Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on March 30, 2021.

/s/ Sandra Gant

Sandra Gant